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Body

Document Body

i've incorporated your inputs. sit back and enjoy the fruits of your labor. glad you're still feeling good (b) (6).

II. Significant Issues:

A. Canceled Projects Reinstated: The regulatory agencies received copies of GAFB's funding requests to reinstate two canceled site characterization projects (new/current skeet range and dieldrin in groundwater). GAFB provided the courtesy copies to show their good faith effort as these sites have been long contentious issues. Air Force (AF) headquarters' recent approval of the funding requests will allow GAFB to finally head in the right direction. Hopefully, adequate site assessments and/or response actions can be accomplished efficiently for these sites as the regulatory agencies have requested this for several years because of priority reuse concerns.

B. OU1 TCE Groundwater Plume: GAFB needs to take a more proactive approach to resolve the 3 data gap areas while waiting for EPA's seismic imaging results for the most critical data gap. EPA requested GAFB develop specific lithological cross sections to evaluate how to appropriately install additional extraction and monitoring wells. There has been no sound proposals by GAFB on how to proceed with the project since the pump and treat system's production rate was drastically reduced in June 1999.

C. High Desert Power Project: The proposed construction of the high desert power project (HDPP) at site FT-20 planned for Spring 2000 has been delayed until Fall. With funding already approved by AF headquarters, GAFB should quickly conduct the FT-20 groundwater characterization before commencement of the HDPP construction. Not characterizing the TCE groundwater contamination underlying the site fast enough could result in increased costs related to site access difficulties around power plant structures, and more costly innovative characterization techniques. Completing the FT-20 site characterization would also resolve a contentious data gap issue repeatedly addressed by the regulatory agencies.

D. Site OT-51 Assessment. The AF completed their PneuLog SVE system test that gathered flow rate data to assess the subsurface air flow under bioventing conditions. The SVE's internal combustion engine system ran mainly off the subsurface petroleum mass, suggesting that SVE is an effective method for mass removal. The SVE system was shut off after the 30 days test period and left in place for GAFB to use. GAFB will evaluate the SVE data along with their own extensive soil and soil gas sampling results to determine if the best course of action is bioventing or SVE. The regulatory agencies, including DTSC, encouraged GAFB to switch from bioventing to SVE over a year ago. During the planning process for conversion to SVE, the BEC abruptly stopped the process a year ago and wanted to conduct soil sampling to further evaluate bioventing effectiveness. The regulatory agencies have repeatedly cited that bioventing was not working effectively in the deep subsurface zone based on past respiration test results. EPA requested OT-51's focused assessment efforts in part from the LRA's priority transfer request for this site.

E. OU2 JP-4 Groundwater Plume The small pilot SVE project that was to start by the second quarter of FY00 was unexpectedly delayed by the AF's consultant on the project. Implementation of the pilot project will be a significant step toward a better cleanup direction for the estimated 800,000 gallons of floating JP-4 free product. The pilot will be expanded to a larger and permanent system if site conditions prove favorable for SVE. Regulatory agencies are concerned

about the time frame for a permanent system since we are not aware of any project and/or funding in the current fiscal year to accomplish a FS.

III. Community Issues:

The LRA continues to inquire about GAFB's cleanup progress because of their priority parcel transfer requests for the current skeet range and site OT-51.

IV. Upcoming FOSL, FOST, AND OPS:

None

Status of Transfer:

A. EPA sent out comments on the FOST for subparcels D-11, 17-22 and portion of D-5, citing that we could not concur with the transfer request until an adequate assessment and/or response has been completed for the New/Current Skeet Range.

B. To speed up the transfer of site OT-51 and its affected parcel, GAFB needs to focus on source removal efficiency and cleanup time. Continuing with only bioventing at this site will further delay the parcel transfer (see Site OT-51 Assessment inputs above) and aggravate the LRA.